

Remarks/Arguments

These remarks are in response to the Office Action dated September 10, 2004. A Request for Extension of Time is included herewith.

At the time of the Office Action, claims 2-17 were pending in the application.

Claims 9, 12 and 15 were objected to under 37 CFR § 1.75(c).

Claim 15 is amended for clarity, withdrawal of the objection to claim 15 is respectfully requested.

Claim 9 was rejected under 35 U.S.C. § 112, second paragraph. Claims 9 - 14 and 16 - 17 were rejected under 35 U.S.C. § 101. Claims 9 - 14 and 16 - 17 were rejected under 35 U.S.C. § 102(b).

The rejections are set out in more detail below.

I. **Brief Review of Applicants' Invention**

Prior to addressing the Examiner's rejections on the art, a brief review of applicants' invention is appropriate. The invention relates to a method for coding a picture sequence which allows for horizontal movement of an object in the sub-picture display window while making efficient use of memory. Specifically, the method includes the step of defining an instruction area having control instructions for display of a sub-picture sequence. The control instructions include address pointers that determine where in a data area a run-length decoding is to start. Further, address pointers of successive ones of the control instructions are chosen such that the run-length decoding starts at predetermined different addresses in the sub-picture to cause a predetermined motion and direction of the sub-picture formed within a display picture.

II. **Allowable Subject Matter**

Applicants note with appreciation that claims 2 - 8 and 15 are allowed.

III. **Claim Rejections Under 35 U.S.C. § 112 and 35 U.S.C. § 101**

Claim 9 was rejected under 35 U.S.C. § 112, second paragraph, for being indefinite, and claims 9 - 14 and 16 - 17 were rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Claims 9 and 14 have been canceled. Claims 16 and 17 have been amended to clarify the statutory subject matter. Claims 10 - 13 have been amended to depend from amended claim 16 and now also are directed to statutory subject matter.

IV. Claim Rejections Under 35 U.S.C. § 102(b)

Claims 9 - 14 and 16 - 17 were rejected under 35 US.C. §102(b) as being anticipated by U.S. Patent No. 5,758,007 to Kitamura, et al ("Kitamura"). As noted, claims 9 and 14 have been canceled.

Claim 16 recites a method for coding a sub-picture data unit. The method includes the step of defining an instruction area having control instructions for display of a sub-picture sequence. The control instructions include address pointers that determine where in a data area a run-length decoding is to start. Further, address pointers of successive ones of the control instructions are chosen such that the run-length decoding starts at predetermined different addresses in the sub-picture to cause a predetermined motion and direction of the sub-picture formed within a display picture. This limitation is not disclosed by Kitamura. Indeed, Kitamura does not even teach or suggest causing motion by successively decoding sub-pictures when the run-length decoding starts at predetermined different addresses in the sub-picture. The Examiner has asserted that this is shown in Figs. 42-43, however, Applicant respectfully disagrees. Neither of these figures disclose starting run-length decoding at predetermined different addresses.

Claim 17 depends from claim 16 and further recites the step of defining the control instructions to additionally include an instruction defining processing of combined pixels of a combined picture piece. Kitamura also fails to disclose this limitation. More particularly, Kitamura does not even teach or suggest combined pixels or a combined picture piece. The Examiner has asserted that the recited limitation is disclosed in Fig. 7, however, Fig. 7 pertains to encoding of pixel information, not combining pixels or picture pieces.

Claim 13 recites using a control instruction selected from the group consisting of SET_COLOR and CHG_COLCON in a display control instruction

sequence (SP_DCSQT) in order to define a way in which the combined pixels of a combined picture piece are to be evaluated in associated areas. Kitamura also fails to disclose this limitation. The Examiner asserts that this limitation is disclosed in Fig. 34, however, Fig. 34 merely shows a table in which SET COLOR and CHG COLCON instructions are listed. There is absolutely no teaching or suggestion that these instructions are used to define a way in which combined pixels of a combined picture piece are to be evaluated.

Claims 10 - 12 are believed allowable at least based on their dependence on an allowable base claim.

V. New Claims

New claims 18 - 20 have been added and are believed to contain allowable subject matter. Specifically, new claim 18 depends from amended claim 16, which is believed to be in condition for allowance. New claim 19 is directed to a machine readable storage which causes a machine to perform the steps contained in allowed claim 15. Similarly, new claim 20 is directed to a machine readable storage which causes a machine to perform the steps contained in claim 16.

VI. Conclusion

For the foregoing reasons, this entire application is believed to be in condition for allowance which is respectfully requested.

Respectfully submitted,
Marco Winter, et al.

2/9/2005

By: Francis A. Davenport
Francis A. Davenport
Reg. No. 36,316
(609) 734-6805

Patent Operations
Thomson Licensing Inc. Suite 200
P.O. Box 5312
Princeton, New Jersey 08543-5312